

**Carsten, Douglas**

**From:** mak@kramerlawip.com  
**Sent:** Wednesday, March 05, 2008 7:28 AM  
**To:** Carsten, Douglas  
**Cc:** michael@kalerlaw.com; esbjork@gmail.com  
**Subject:** RE: Sorensen v Sanyo

Dear Mr. Carsten,

I will prepare a stipulation and forward it to you promptly. I am out of town today, but should have it ready for you tomorrow. Also, we will endeavor to have a proposal regarding discovery to you by March 31st.

Sincerely,

Melody A. Kramer

> ----- Original Message -----  
> From: "Carsten, Douglas" <DCarsten@foley.com>  
> To: mak@kramerlawip.com  
> Subject: RE: Sorensen v Sanyo  
> Date: Tue, 4 Mar 2008 13:51:00 -0800  
>  
>  
> Hello Ms. Kramer,  
>  
> Thank you for your email. Sanyo accepts your offer of an additional thirty days in which to respond to the complaint. By my calculation, that would place Sanyo's response date up to and including April 9, 2008. If my calculation is incorrect, please do not hesitate to let me know. In addition, please let me know if you would be so kind as to prepare a suitable stipulation acceptable to Sorensen for my review.  
>  
> I presume from your email that this extension will serve to allow you to further determine the terms Sorensen would request in connection with a proposed partial stay. I would appreciate your providing to me whatever proposal Sorensen has in mind for such a partial stay on or before March 31, 2008 so that Sanyo has appropriate time to digest your proposal in advance of the response date. I would also request that such a proposal specifically set forth what discovery (if any) Sorensen would request in connection with such a partial stay. Please let me know at your earliest convenience if you agree to providing that information in the stated timeframe.  
>  
> I look forward to hearing from you.

>  
> Truly yours,

>  
> Doug Carsten

> -----Original Message-----

> From: mak@kramerlawip.com [mailto:mak@kramerlawip.com]  
> Sent: Tuesday, March 04, 2008 9:59 AM  
> To: Carsten, Douglas  
> Cc: michael@kaler.com  
> Subject: Sorensen v Sanyo  
>  
> Dear Mr. Carsten:  
>  
> Thank you for your email of February 28th.  
> Based on some recent developments, I will not be in a position to forward you a proposed stipulation for partial stay of this case yet.  
> Comments by Judge Moskowitz in a related proceeding (transcript attached), as well as new information that we presented to the Court

> in opposition to another motion for stay (memorandum attached), place  
> the entire landscape of the scope and duration of any stay that the  
> Court may enter in substantial question.  
>  
> If Sanyo would like to have an additional 30 days before having to  
> respond to the Complaint, we are amenable to such a stipulation.  
>  
> Melody A. Kramer  
> Kramer Law Office, Inc.  
> 9930 Mesa Rim Road, Suite 1600  
> San Diego, CA 92121  
> 858/362-3150 direct  
> 858/824-9073 fax  
>  
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>

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